AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

- 1. Your affiant, Special Agent Brandon D. Lightner, is a criminal investigator with the United States Department of Veterans Affairs (VA) Office of Inspector General (OIG), and a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing federal criminal laws and duly authorized by the Attorney General to request an arrest warrant. My duties include investigating crimes, executing warrants, and making arrests for offenses against the United States relating to programs and operations of the VA, and performing other duties as authorized by the Inspector General Act (PL 95-452). In the course of these duties, I have come to investigate Courtney B. SEDLER (SEDLER) and have learned the following facts.
- 2. On February 28, 2022, SEDLER called VA Police Chief Vincent Kennedy, VA Medical Center, Clarksburg, West Virginia, which is within the Northern District of West Virginia. During this call, which was witnessed in part by VA Police Detective William Dawson, SEDLER complained how the VA did not help her and began yelling threats saying, "I want to kill you, I want to hurt you and make you suffer". She then repeated "I want to hurt you" five or six times in a row.
- 3. On March 1, 2022, SEDLER again called Chief Kennedy, which he then recorded. During this call, SEDLER complained about people not helping her, including people at the VA. She repeatedly told Chief Kennedy that "you people really messed me up". She repeatedly complained about how she was treated at the VA. Then she repeatedly screamed "I just want to kill you". When Chief Kennedy asked why she wanted to kill him when all he does is listen, SEDLER repeatedly screamed that, despite everything she wanted, he "just doesn't care".
- 4. On March 4, 2022, during an interview with your affiant and VA OIG Special Agent Juan Sanin Prieto, SEDLER denied threatening Chief Kennedy but admitted that it would feel good if she killed someone at the VA.
- 5. On October 6, 2022, SEDLER called Chief Kennedy, which he then recorded. During this call, SEDLER was screaming about not having nice things. Chief Kennedy advised her she would have to work for things and have a job to get what she wants. She began screaming "No, I will kill you first," "I will fucking kill you first". Chief Kennedy advised her she can't say things like that because it was a threat, and she could be charged criminally. She stated, "I'll never get a job there again, I will fucking kill you". Chief Kennedy reminded her of what he said about being charged. She began to scream so loud it was hard to decipher what exactly she said. She did scream about how she was not treated well. Chief Kennedy attempted to calm her down while she continued to scream. She did state "I will fucking kill you" again before Chief Kennedy ended the call.
- 6. On October 11, 2022, SEDLER called Dr. Heather Brown, Psychologist, VAMC Clarksburg. During the call SEDLER was wanting to know why her appointments were being scheduled as VA Video Connect (VVC) appointments. Dr. Brown asked if SEDLER

might have said or done anything that led to the decision for VVC versus in person treatment sessions. After several prompts, she admitted that she was "upset about Jordan," a VA police officer, and also "got upset on the phone with Chief Kennedy." When asked by Dr. Brown if she might have "said anything that crossed a line," she said that she had told Chief Kennedy that "I'd rather see you and Jordan dead." During this call, she stated that she "still lives near [VA Police Officer] Dawson-just keep making me mad!" "I want my nice life now" and, in "another week, this is going to be over. I'm fucking done." The conversation between Dr. Brown and SEDLER was documented by Dr. Brown in VA's disruptive behavior reporting system.

- 7. On October 12, 2022, VA Police Criminal Investigator Dawson received a voluntary witness statement from Dr. Brown. Dr. Brown stated a second called was made on October 11, 2022, by SEDLER. During that call, Dr. Brown asked SEDLER to clarify her previous comment about "one more week". SEDLER said she "thinks something bad will happen" and "feels like I'm going to snap". She also commented "if anything did happen, people would ask why we didn't help her".
- 8. Based on the facts set forth above, your affiant believes there is probable cause that, on or about February 28, 2022, March 1, 2022, and October 6, 2022, in Harrison County, in the Northern District of West Virginia, the defendant, SEDLER, threatened to kill or murder Vincent Kennedy, Chief of the Veterans Affairs Police, with intent to impede, intimidate, interfere with Vincent Kennedy while he was engaged in, or retaliate against Vincent Kennedy on account of the performance of, his official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(B) and 115(b)(4).

Affiant:

Brandon D. Lightner

Special Agent

United States Department of Veterans Affairs – Office of

Inspector General

Pittsburgh, PA Resident Agency

Sworn to before me and subscribed in my presence this 13 day of October 2022.

MICHAEL JOHN ALOI UNITED STATES MAGISTRATE JUDGE